

ELECTRONICALLY FILED
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60CV-13-2439

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS

KATHY GARNER

PLAINTIFF

VS.

NO.

TARGET CORPORATION &
JOHN DOE #1

DEFENDANT

COMPLAINT

Comes Plaintiff by her attorney, Brent Baber, and for her Complaint states:

1. Plaintiff is a resident of Pulaski County, Arkansas.
2. Target Corporation is a Minneapolis, Minnesota corporation authorized to do business in the State of Arkansas. Target Corporation's agent for service is The Corporation Company, 124 West Capitol Ave., Suite 1900, Little Rock, Arkansas, 72201.
3. Defendant John Doe #1 is or was a Target Corporation employee who is unknown to Plaintiff at this time. He is reasonably believed to be a resident of Pulaski County, Arkansas. Counsel's affidavit is attached pursuant to Ark. Stat. 16-56-125.
4. All acts complained of herein occurred in Pulaski County, Arkansas.
5. The court possesses jurisdiction and venue.
6. Plaintiff entered the property owned by Defendant at 4000 McCain Blvd., Ste. A, North Little Rock, Arkansas 72116, on July 28, 2011.
7. Plaintiff made a payment to Target Corporation. As she left the building she paused at a trash receptacle. Without warning John Doe #1 drove a line of shopping carts into Plaintiff's legs. Plaintiff's legs were trapped against the trash receptacle. Plaintiff yelled to John Doe #1, Target Corporation's employee, "get it off me." The employee John Doe #1 was unable to move the cart, though he eventually was able to turn off the machine pushing the carts and free

Plaintiff.

8. John Doe #1 was acting in the course and scope of his employment for Target Corporation. All acts of John Doe #1 are charged to Target Corporation.

9. On information and belief Plaintiff alleges that Defendant Target Corporation was negligent in failing to properly train John Doe #1 in the operation of the cart pushing machine in that he was unable to manipulate the machine in order to free Plaintiff.


10. The negligence of Defendants proximately caused damages to Plaintiff.

11. Plaintiff was injured and required medical care and incurred medical expenses. She continues to require medical care, she has lost wages and will continue to lose wages in the future. She has lost ability to earn wages. She has experienced pain and suffering and will do so in the future. She is totally and permanently disabled.

12. The amount in controversy exceeds \$75,000.00.

WHEREFORE, Plaintiff prays for an award of compensatory damages, for costs, expenses and any other relief to which she is entitled.

Respectfully submitted,


Brent Baber
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